

Appl. No. 10/750,025  
Amdt. Dated Oct. 10, 2005  
Reply to Office Action of Aug. 23, 2005

## REMARKS

### Amendment of Claim 12

Referring to FIG. 1 of the application and specification of paragraph 15, lines 4 to 10, we can see that there's a clerical error in previously amended Claim 12, where "the primary feedback circuit is linked to the secondary feedback circuit" should be "the primary photosensitive element is linked to the secondary feedback circuit". So we have amended claim 12 based on the specification and drawings. Therefore, there is no new matter entered.

Moreover, Applicant submits that the amendment to claim 12 does not constitute a new issue, as claim 1 (previously amended) recites, in part:

said secondary feedback circuit receives at least two photoelectric currents of said photosensitive elements . . .

As such, claim 1, as previously amended, establishes a "link" between the "secondary feedback circuit" and the "photosensitive elements". Accordingly, Applicant submits that no new issues are raised by the current amendment to claim 12 and respectfully requests the entry thereof.

### Claim Rejections Under 35 U.S.C. 102

Claim 12 is rejected under 35 U.S.C. 102(b) as being anticipated by Smelker (6,207,943).

In response to this rejection, Applicant has amended claim 12 accordingly. Applicant has amended claim 12, which now recites, in part:

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“...at least one secondary sub-system including a secondary driving circuit..., and a secondary feedback circuit connected in series; wherein the primary photosensitive element is linked to the secondary feedback circuit. . .”

Applicant submits that the subject matter of claim 12, as amended, is neither taught nor suggested by Smelker '943 or any of the other references, taken alone or in combination.

Smelker does disclose a consistent brightness backlight system that includes, arranged in series, a lamp (100), a sensor array (104), an amplifier circuit (105), an averaging circuit (107), a comparator circuit (106a), a controller (108) and an inverter circuit (109), as shown in FIG. 2 of US 6,207,943.

The Examiner contends that the amplifier circuit 105 is a primary feedback circuit and that the averaging circuit 107 is a secondary feedback circuit. The sensor array 104 includes photocells 104a and 104b, where photocell 104a is named as the primary photosensitive element and photocell 104b is named as the secondary photosensitive element by the Examiner. It is known to all having ordinary skill in the art, what we call “feedback circuit” is a circuit that feeds back some of the output to the input of a system.

From the system described in US 6,207,943, Smelker does disclose a system that is composed of two blocks, as a matter of fact. One is an amplifier block, which consists of a lamp (100), photosensitive element (104), amplifier circuit (105) and averaging circuit (107). The other is a feedback block, which consists of a comparator circuit (106a), controller (108) and inverter circuit (109). For the feedback block,  $V_{avg}$  generated by

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the amplifier block is the input signal, and  $V_1$  generated by the feedback block is the output signal. For the amplifier block,  $V_{avg}$  is the output signal, and  $V_1$  is the input signal of the amplifier block, the feedback block connects the output signal and the input signal of the amplifier block. Considering the system disclosed in US 6,207,943, Applicant submits that, Smelker discloses only one feedback.

Furthermore, the function of the amplifier circuit (105) is to amplify signals routed thereto and to then provide amplified signals to be fed into the averaging circuit (107), not to regulate and modulate the primary light tube directly. Additionally, the function of the averaging circuit (107) is to receive amplified signals from the amplifier circuit (105) and generate an averaged voltage signal, the averaged voltage signal  $V_{avg}$  is then input to a comparator circuit. Thus, the amplifier circuit (105) in US 6,207,943 cannot be named as a primary feedback circuit, and the averaging circuit (107) cannot be named as a secondary feedback circuit.

Since Smelker fails to even teach or suggest a "secondary feedback circuit", Smelker clearly fails to teach or suggest the illumination system as recited in currently amended claim 12.

Accordingly, currently amended claim 12 is submitted to be novel, unobvious, and patentable over Smelker under both U.S.C. 102(b) and U.S.C. 103. Further, applicant submits that neither Smelker nor any of the other cited references, alone or in combination, teaches, discloses, or otherwise suggests the invention as currently recited in amended claim 12. Reconsideration and withdrawal of the present rejection and allowance of currently amended claim 12 are therefore respectfully requested.

**Allowable Subject Matter**

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The Examiner has indicated that claims 1-11 and 13 are allowable, for which consideration the Examiner is respectfully thanked.

In view of the foregoing, the present application as claimed in the pending claims is considered to be in a condition for allowance, and an action to such effect is earnestly solicited.

Respectfully submitted,

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